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VIA ECF FILING

The Honorable Denise Cote
United States District Court
500 Pearl Street
New York, NY 10007

Re: Andrea Rossbach v. Montefiore Medical Center, et al.
Civ. Action No. 19-cv-5758 (DLC)

Dear Judge Cote:

We are counsel to Defendants in the above-referenced matter. We write in response to the Plaintiff's August 25, 2021 letter (Dkt. 100) seeking an interlocutory order to stay this matter regarding Plaintiff's opposition to Defendants' fee application pending a decision from the Second Circuit on Plaintiff's appeal of this Court's August 5, 2021 sanction award (Dkt. 97).

Defendants object to Plaintiff's request to the extent it requests a stay only as to her opposition to Defendants' fee application and not also as to Defendants' fee application. Pursuant to the Court's August 5, 2021 Order (Dkt. 98), Defendants' application for fees is due today, August 26, 2021.

We respectfully request that if the Court grants Plaintiff's motion for a stay, the date for Defendants' application for fees also be stayed until 10 days after the Second Circuit's decision on Plaintiff's appeal (Dkt. 99).

Given that Plaintiff did not file her motion for a stay until 11:35 p.m. last night, we also respectfully request that the date for Defendants' application for fees be stayed until two days after the Court rules on Plaintiff's motion so that if the Court grants the motion, Defendants will not have to file their application for fees until after the Second Circuit's decision.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Jean L. Schmidt

Jean L. Schmidt

Cc: Daniel Altaras, Esq., Derek Smith Law Group, PLLC, *Counsel to Plaintiff*